BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 2001

VAL-PAK DIRECT MARKETING SYSTEMS, INC. AND
VAL-PAK DEALERS' ASSOCIATION, INC.
DESIGNATION OF WRITTEN CROSS-EXAMINATION AND
NOTICE CONCERNING ORAL CROSS-EXAMINATION OF
UNITED STATES POSTAL SERVICE WITNESS JOSEPH D. MOELLER (USPS-T-28)
(January 9, 2002)

Written Cross-Examination

Pursuant to section 30(e)(2) of the Postal Rate Commission rules of practice, Val-Pak Direct Marketing Systems, Inc. and Val-Pak Dealers' Association, Inc. ("Val-Pak") hereby designate the following responses to interrogatories as their written cross-examination of United States Postal Service witness Moeller:

VP/USPS-T28-1-12

NAA/USPS-T28-4, 5, 10

Two copies of the above documents are submitted herewith to the Secretary of the Commission.

Oral Cross-Examination

Pursuant to Presiding Officer's Ruling No. R2001-1/27, Val-Pak filed a request on January 7, 2002 to orally cross-examine United States Postal Service witness Moeller. With the inclusion into the record of the discovery requests set out above, Val-Pak will waive oral cross-examination of witness Moeller.

Respectfully submitted,

William J. Olson

John S. Miles

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John St. Miles Miles

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.

January 9, 2002